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**VIA ELECTRONIC SUBMISSION**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW – Lobby Level  
Washington, D.C. 20554

**Re: WC Docket No. 06-122 – Petition of Nebraska Public Service Commission  
and Kansas Corporation Commission for Declaratory Ruling**

Dear Ms Dortch:

Yesterday, Robert Quinn, Gary Phillips, and I, all of AT&T, met with General Counsel Austin Schlick, Deputy General Counsel Julie Veach, Richard Welch and James Carr of the Office of General Counsel, and Rebekah Goodheart of the Wireline Competition Bureau. During the meeting we discussed the above-reference petition. The discussion was consistent with AT&T's comments in this proceeding.

We recommended that the Commission not retroactively narrow the scope of preemption of state regulation of interconnected voice-over-IP services (VoIP). We urged the Commission instead to authorize states to require interconnected VoIP providers to contribute to state universal service mechanisms on a prospective basis only, and pursuant to a uniform methodology to ensure that VoIP providers not be subjected to intrastate assessments in multiple states for the same customers. Inconsistent intrastate contribution mechanisms would not only entail double assessments, but could also force VoIP providers to incur significant costs in modifying their billing and accounting systems, which would ultimately be passed on to consumers.

If you have any questions or need additional information, please do not hesitate to contact me. Pursuant to section 1.1206 of the Commission's rules, this letter is being filed electronically with the Commission.

Sincerely,

Henry Hultquist

Cc: Austin Schlick  
Julie Veach  
Richard Welch  
James Carr  
Rebekah Goodheart